

RCRA CORRECTIVE ACTION PROGRAM

STATEMENT OF BASIS February 2022

OmniSource, LLC
Former Bridgeport/Olin Brass Facility
1800 South Holt Road
Indianapolis, Indiana
U.S. EPA ID. IND 000810739

I. INTRODUCTION

Under the Resource Conservation and Recovery Act (RCRA), all permitted and interim status hazardous waste treatment, storage, or disposal facilities are required to conduct corrective action for any releases of hazardous waste or hazardous constituents at or from their facilities.

This Statement of Basis is issued by the Indiana Department of Environmental Management (IDEM), regarding OmniSource, LLC (formerly Bridgeport/Olin Brass), 1800 South Holt Road, Indianapolis, Indiana 46241. IDEM has determined that no further corrective action is necessary for any of the identified Solid Waste Management Units (SWMUs) or Areas of Concern (AOCs) at this facility.

IDEM is issuing this Statement of Basis as part of its public participation responsibilities under RCRA Corrective Action Program guidance and is using the administrative procedures found in 40 CFR Part 270, as adopted by reference, to provide public notice and solicit comments. The public notice period is hereby announced and will continue for 30 days from the published date of the Public Notice in the INDYSTAR.

This Statement of Basis summarizes information found in greater detail in the work plans, reports, or other documents in this facility's administrative record, which can be accessed via IDEM's Virtual File Cabinet (VFC). IDEM encourages the public to review these documents in order to gain a more comprehensive understanding of the facility and the activities that have been conducted. IDEM may modify this corrective action determination or select another remedy based on public comments or new information obtained.

This determination will complete the corrective action process under the RCRA Corrective Action Program for this facility. The facility must continue to comply with all applicable parts of RCRA.



II. FACILITY BACKGROUND

The facility was designed and built by Bridgeport Brass Company in 1942. Bridgeport manufactured copper and brass cartridges and other brass and copper products. In 1975, the facility was sold to National Distillers and Chemical Corporation, which continued brass sheet and copper tube production. On August 17, 1984, Bridgeport Brass Company's name was changed to Bridgeport Brass Corporation. Olin Corporation acquired the facility in September 1988 and operated the plant under the name Olin Brass until production ended in February 2003. In 2004, the plant was decommissioned. All structures, including buildings and concrete flooring, were removed and disposed. On November 16, 2004, Olin Brass sold the property to First Highland Management and Development Corporation. Sometime after 2004, OmniSource Corporation purchased the property. OmniSource was acquired in 2007 by Steel Dynamics, Inc., and operates the facility independently as a wholly owned subsidiary.

During the years of manufacturing of copper and brass products, processes included: a metal room for receiving and mixing of both scrap and virgin metals for the production of copper and brass rod, sheet, and tube; a casting division for casting bars and billets; a sheet mill for production of brass and copper sheet; a tube mill for production of copper or brass tube; and a rod mill for production of copper or brass rod or wire.

Beginning in 1942, the facility operated a surface impoundment on-site. In the early 1970s, the impoundment was split into three portions: one portion dedicated to non-contact cooling water from air conditioning and surface water drainage, gutters, etc. This water was discharged to Eagle Creek and controlled by a NPDES permit. The second portion was dedicated to contact cooling water (hot and cold rinses), which was comprised of waste sulfuric acid and waste pickle liquor. This process wastewater reached the POTW portion of the surface impoundment through dedicated sewers and was discharged to Indianapolis' POTW. The third portion was dedicated to the sludge dredged from the bottom of the two aforementioned impoundments.

Bridgeport submitted its Notification of Hazardous Waste Activity on August 1, 1980 for ignitable and toxic hazardous waste. On November 12, 1980, Bridgeport filed its original RCRA Part A Permit Application, indicating the facility was a RCRA treatment, storage, and disposal facility. The Part A included process codes for the three surface impoundments as well as a code for container storage. On February 16, 1982, Bridgeport revised its Part A Application to include F002, D006 and D008 hazardous wastes.

Bridgeport sent a letter to the U.S.EPA on April 7, 1982 requesting the deletion of process codes for the three surface impoundments from Bridgeport's Part A application. On May 13, 1982, U.S. EPA issued a letter to Bridgeport agreeing the disposal and storage surface impoundments could be deleted from the Part A Application because testing by an independent lab adequately showed the

sludge contents to be nonhazardous. However, U.S. EPA requested more information for the treatment portion of the surface impoundment. Specifically, additional information was needed regarding the influent to the impoundment and its status under RCRA. Bridgeport's response letter of May 25, 1982 adequately explained the influent to the treatment impoundment as already treated (neutralized in a pipe before discharge into the impoundment), thus the impoundment did not contain hazardous waste. Bridgeport again requested the withdrawal of the treatment impoundment from its Part A application.

On February 9, 1984, IDEM issued a letter to Bridgeport acknowledging Bridgeport's verbal request to withdraw its Part A Permit Application. Bridgeport stated it would like to be considered a generator of hazardous waste only and accumulate hazardous wastes on-site for less than 90 days. IDEM explained that based on file information, Bridgeport stored hazardous waste for longer than 90 days at some point in time since November 1980. Therefore, the facility is subject to closure requirements of 40 CFR 265 Subpart G. On February 14, 1984, IDEM received Bridgeport's Closure Plan for the 13,090 gallon 55-gallon container storage area.

On May 31, 1984, IDEM accepted Bridgeport's certification of closure of the container storage area. The letter also informed Bridgeport that they can now petition the U.S. EPA to change the status of the company to that of generator.

In August 1984, IDEM's questions concerning the facility's wastewater treatment plant and surface impoundments were satisfactorily answered during an inspection. Analysis provided by Bridgeport in 1983 (and other analyses which pre-date 1983) of the POTW surface impoundment(s) satisfactorily determined the treatment impoundment did not contain characteristically hazardous waste and that treatment prior to discharge to the third lagoon is from a totally enclosed treatment process [40 CFR. 260.10, 265.1(c)(9)]. Therefore, in a letter dated October 4, 1984, IDEM recommended the U.S. EPA proceed with granting Bridgeport's request of change in status to generator only.

On January 24, 1986, the U.S. EPA issued a letter informing Bridgeport the wastes which were managed in the wastewater treatment impoundment were not hazardous wastes. The letter acknowledges the complete closure of the container storage process at the facility. Consequently, Bridgeport was no longer required to seek a Part B hazardous waste permit under Section 3005 of RCRA. However, based on its interim status for container storage, the facility remained subject to RCRA Corrective Action.

The property is enclosed by a perimeter fence and is surrounded by commercial businesses. Currently, the site is mainly used as storage for trailers and scrap steel piles.

The facility entered the IDEM's Voluntary Remediation Program (VRP) in September 2014.

2.4 Regulatory

IDEM conducted a site visit on June 2, 2011, to evaluate the facility for SWMUs and AOCs that required additional scrutiny. During this visit, the following six (6) SWMUs and one AOC were identified:

| | |
|--------|-------------------------------------|
| SWMU 1 | Water Treatment Plant Sludge Vault |
| SWMU 2 | Roof Runoff Drywells |
| SWMU 3 | Underground Storage Tanks |
| SWMU 4 | Former Container Storage Area |
| SWMU 5 | Main Mill Casting Shop Basement |
| SWMU 6 | Former Surface Impoundment Area |
| AOC 1 | Trichloroethylene Groundwater Plume |

SWMUs 1-4 showed evidence of an existing release. Historical data indicated there had been releases from SWMU 6 and AOC 1. The RCRA Facility Assessment (RFA) report recommended the groundwater at these units should be further investigated. Further information is available in the RFA report (VFC # 63540858).

2.5 History of Documented Releases

Soils

OmniSource's Phase II report indicated several volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and metals were detected at levels above the 2006 Risk Integrated System of Closure (RISC) industrial closure levels.

Trichloroethylene (TCE) was detected near the former drum storage area at levels exceeding the RISC industrial 2006 level; however, when these levels are compared to 2013 Remediation Closure Guide levels for industrial exposure, they are no longer exceedances.

The SVOCs and cyanide were detected but did not exceed the 2006 RISC industrial closures levels.

Polychlorinated biphenyls (PCBs) and total petroleum hydrocarbons (TPH) ERO were not detected in the soils.

Arsenic, barium, chromium, copper, lead, selenium, and zinc were detected at levels above the industrial closure levels.

The RFA report did not identified any sources for the soil contamination.

GROUNDWATER

TCE was detected at concentrations above the industrial closure levels, down gradient from the former diesel/TCE/methylene chloride UST. This unit was not identified in the RFA report but the groundwater plume in the area where this

tank was located was identified as AOC 1. All other VOCs detected were at levels below the industrial closure levels.

Carcinogenic polycyclic aromatic hydrocarbons (cPAHs) were detected at levels below industrial closure levels.

Total arsenic, chromium, copper, and lead were detected at concentrations greater than the RISC industrial default closure levels (IDCLs). Dissolved metals results are below residential default closure levels (RDCLs).

Sulfate was detected at levels below the secondary maximum contaminant levels (SMCLs).

Vinyl chloride was detected in Monitoring Well 02 at levels above the RDCL but below the IDCL. This well is on the edge of the former surface impoundment area (SWMU #6). Trichloroethylene Ground Water Plume (AOC 1) had detections of TCE above the IDCL of 31 ppb in well PTW-1 (100 ppb). PTW-1 is located just outside the former main mill plant building, northwest (upgradient) of the former container storage area and immediately north of where Tank #3 used to be located. Additionally, another well TW4(B) (120 ppb) located directly southeast of the former container storage area also shows TCE contamination above the IDCL.

2.6 Site Remediation

Multiple investigations were conducted at the site between 2006 and 2018 to determine the nature and extent of soil and groundwater impacts. Additionally, IDEM's RCRA Corrective Action program recommended further investigation of the groundwater at AOC #1 and SWMU #6. AOC #1 was the general location of a former underground storage tank (UST), a former drum storage area, and other former site operational areas. SWMU #6 consisted of a former treatment pond, a legacy NPDES pond, and a former sludge impoundment area. The current site layout no longer contains the features described in AOC #1 and SWMU #6. The approved Remediation Work Plan (RWP) (VFC # 80126410) addressed any contamination at those areas as part of the overall site remedial strategy.

Groundwater monitoring was conducted for four consecutive quarters from April 2018 through January 2019 (VFCs 82742799, 82673271, 82658240, 82620270). Lines of evidence to support eventual site closure were presented in a Quarterly Groundwater Monitoring Report and Discussion of Closure Strategy dated March 22, 2019. OmniSource, LLC, submitted a Remediation Completion Report (RCR) on 7/15/2019 (VFC # 82810081) and it was approved on 06/11/2020 (VFC # 82985883). OmniSource, LLC submitted an ERC, on January 10, 2020. IDEM approved the ERC which was recorded on April 8, 2020 (VFC # 82946169).

The property is enclosed by a perimeter fence and is surrounded by commercial businesses.

IV. SUMMARY OF THE CORRECTIVE ACTION DETERMINATION

Based on the administrative record, IDEM is proposing no further action for all the identified SWMUs and AOCs. IDEM is proposing that a Corrective Action Complete With Controls determination be issued for OmniSource, LLC (IND096173984 formerly Bridgeport/Olin Brass). "With Controls" recognizes that OmniSource, LLC recorded an Environmental Restrictive Covenant (ERC) (VFC # 82946169) prohibiting certain uses, including residential, daily childcare facilities or educational facilities for children, and agricultural. The ERC, also, requires any new structure constructed or allows occupancy in the portion of the Real Estate depicted in Exhibit B of the ERC must have a vapor mitigation system installed. In addition, the ERC prohibits the extraction or use of ground water, unless it is extracted in conjunction with environmental investigation and/or remediation activities.

V. PUBLIC PARTICIPATION

The public is encouraged to review and submit written comments on this proposed determination, particularly if you are aware of past spills and/or releases that have occurred at this facility. You may request IDEM hold a public hearing or a public meeting. At a public hearing, you would have the opportunity to submit oral or written comments. At a public meeting, you would have an opportunity to submit written comments, ask questions, make statements, and otherwise discuss any concerns about the permit renewal with IDEM staff. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing/meeting 30 days in advance.

The Public Notice and the administrative record are available for review on IDEM's Virtual File Cabinet. To view these documents, go to <http://vfc.idem.in.gov/>. After checking the "I'm not a robot" box, select "Document ID" from the Alternate Field drop-down menu and then enter the document number in the ID # cell. VFC document numbers are provided in Section VI. for the primary documents IDEM used to support this decision.

Before taking final action, IDEM will give full consideration to all significant and relevant comments received. IDEM will summarize the comments and its responses to the comments and announce its decision in a Final Decision/Response to Comments document. This document will be incorporated into the administrative record. To send written comments or obtain further information, contact:

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VI. REFERENCES

Covenant Not Sue, dated 06/21/2021 (VFC # 83171332)

Certificate of Completion, dated 10/02/2020 (VFC # 83123131)

Completion Report Approval, dated 06/11/2020 (VFC # 82985883)

Environmental Restrictive Covenant, dated 04/08/2020 (VFC # 82946169)

Remediation Completion Report, dated 09/16/2019 (VFC # 82837603)

Remediation Completion Report, dated 07/15/2019 (VFC # 82810081)

Intent to Proceed, dated 03/04/2019 (VFC # 82710801)

Further Site Investigation Former Bridgeport/Olin Brass Facility, dated 07/09/2018 (VFC # 82580611)

Remediation Workplan Former Bridgeport/Olin Brass Facility, dated 09/11/2015 (VFC # 80126410)

Voluntary Remediation Agreement, dated 04/08/2014, (VFC # 70405762)

Voluntary Remediation Program Application, dated 03/26/2014 (VFC # 69864500)

Application Acceptance Former Bridgeport/Olin Brass, dated 04/15/2014 (VFC # 699187334)

Corrective Action Agreed Order, dated 04/11/2013 (VFC # 67887863)

Corrective Action RCRA Facility Assessment Report, dated 08/31/2011 (VFC # 63540858)

No Further Action, dated 01/11/2001 (VFC # 23075151)

PCB Remediation Report, dated 11/11/1991 (VF C # 62809110)

Phase 2 Assessment Final Report, dated 3/14/91 VFC # 62809121)

Soils Evaluation Phase 2 Assessment Report, dated 3/1991, Part 1 of 2 (VFC (62809637)

Soils Evaluation Phase 2 Assessment Report, dated 3/1991, Part 2 of 2 (VFC # 62809700)

Screening Site Inspection Report for Bridgeport Brass Corporation, dated 09/26/1990 (VFC # 40092963)

Soil and Groundwater Remediation Phase I Assessment Report, dated 11/1989
(VFC # 62809133)

Bridgeport Brass Closure Plan for its container storage area, dated 02/14/1984
(VFC # 2683166)

Executive Summary, dated 07/05/1984 (VFC # 40842963)

Part A Bridgeport Brass, dated 11/12/1980 (VFC # 62683154)